

EXHIBIT 1

Malhi, Jaywin (CRT)

From: Taylor Meehan <taylor@consovoymccarthy.com>
Sent: Friday, May 26, 2023 10:17 AM
To: Kathleen Hunker; Nickolas Spencer; Malhi, Jaywin (CRT); Christopher Hilton; Zachary Berg; Munera Al-Fuhaid; Ryan Kercher; Jessica Yvarra; Elizabeth Saunders; Sharon Murray; frank@consovoymccarthy.com; patrick@consovoymccarthy.com
Cc: Mellett, Timothy F (CRT); Freeman, Daniel (CRT); Rupp, Michelle (CRT); Anderson, Jacki (CRT); Lott, Jasmin (CRT); Berlin, Holly (CRT); Chad Dunn; Noor Taj; Ezra Rosenberg; Kenneth Parreno; Nina Perales; Pooja Chaudhuri; Sofia Fernandez Gold; Sean McCaffity; Tex Quesada; Martin Golando; ddonatti@aclutx.org; tbuser-clancy@aclutx.org; Jerry Vattamala; pstegemoeller@aaldef.org; Mitchell D. Brown; aharris@aclutx.org; slorenzo-giguere@aaldef.org; lindsey.cohan@dechert.com; Steiner, Neil; Robert@notzonlaw.com; Mark Gaber; gainesjesse@ymail.com; David Fox; rhicks@renea-hicks.com; abranh@elias.law; Brooklynn Morris; Julia Longoria; Fatima Menendez; jgonzalez@malc.org
Subject: [EXTERNAL] Re: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Thanks very much, Jaywin. We consent on behalf of the third-party legislators in the House.

From: Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>
Date: Friday, May 26, 2023 at 8:46 AM
To: Nickolas Spencer <nas@naslegal.com>, "Malhi, Jaywin (CRT)" <Jaywin.Malhi@usdoj.gov>, Taylor Meehan <taylor@consovoymccarthy.com>, Christopher Hilton <Christopher.Hilton@oag.texas.gov>, Zachary Berg <Zachary.Berg@oag.texas.gov>, Munera Al-Fuhaid <Munera.Al-Fuhaid@oag.texas.gov>, Ryan Kercher <Ryan.Kercher@oag.texas.gov>, Jessica Yvarra <Jessica.Yvarra@oag.texas.gov>, Elizabeth Saunders <Elizabeth.Saunders@oag.texas.gov>, Sharon Murray <Sharon.Murray@oag.texas.gov>, "frank@consovoymccarthy.com" <Frank@consovoymccarthy.com>, "patrick@consovoymccarthy.com" <patrick@consovoymccarthy.com>
Cc: "Mellett, Timothy F (CRT)" <Timothy.F.Mellett@usdoj.gov>, "Freeman, Daniel (CRT)" <Daniel.Freeman@usdoj.gov>, "Rupp, Michelle (CRT)" <Michelle.Rupp@usdoj.gov>, "Anderson, Jacki (CRT)" <Jacki.Anderson@usdoj.gov>, "Lott, Jasmin (CRT)" <Jasmin.Lott@usdoj.gov>, "Berlin, Holly (CRT)" <Holly.Berlin@usdoj.gov>, Chad Dunn <chad@brazilanddunn.com>, Noor Taj <noor@scsj.org>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Kenneth Parreno <Kparreno@maldef.org>, Nina Perales <nperales@maldef.org>, Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>, Sofia Fernandez Gold <sfgold@lawyerscommittee.org>, Sean McCaffity <SMcCaffity@texttrial.com>, Tex Quesada <Quesada@texttrial.com>, Martin Golando <martin.golando@gmail.com>, "ddonatti@aclutx.org" <ddonatti@aclutx.org>, "tbuser-clancy@aclutx.org" <tbuser-clancy@aclutx.org>, Jerry Vattamala <jvattamala@aaldef.org>, "pstegemoeller@aaldef.org" <pstegemoeller@aaldef.org>, "Mitchell D. Brown" <mitchellbrown@scsj.org>, "aharris@aclutx.org" <aharris@aclutx.org>, "slorenzo-giguere@aaldef.org" <slorenzo-giguere@aaldef.org>, "lindsey.cohan@dechert.com" <lindsey.cohan@dechert.com>, "Steiner, Neil" <neil.steiner@dechert.com>, "Robert@notzonlaw.com" <Robert@notzonlaw.com>, Mark Gaber <mark@markgaber.com>, "gainesjesse@ymail.com" <gainesjesse@ymail.com>, David Fox <dfox@elias.law>, "rhicks@renea-hicks.com" <rhicks@renea-hicks.com>, "abranh@elias.law" <abranh@elias.law>, Brooklynn Morris <bmorris@thebledsoelawfirm.com>, Julia Longoria <Jlongoria@maldef.org>, Fatima Menendez

<fmenendez@maldef.org>, "jgonzalez@malc.org" <jgonzalez@malc.org>

Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

State Defendants also consent.

Kathleen Hunker

Special Litigation Unit
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From: Nickolas Spencer <nas@naslegal.com>

Sent: Friday, May 26, 2023 7:19 AM

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Intervenors are good with it.

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Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Counsel:

Attached are revised drafts of the joint motion and proposed order, which drafts now include a reply deadline of August 11. Do we have your sign off? Upon hearing from you, we'll plug in the placeholders and file soon thereafter. Thanks.

Jaywin Singh Malhi
 Trial Attorney
 Voting Section, Civil Rights Division
 United States Department of Justice
jaywin.malhi@usdoj.gov
 (202) 598-0146

From: Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>

Sent: Wednesday, May 24, 2023 1:53 PM

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Subject: [EXTERNAL] RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Dan,

This email is to confirm our agreement with Taylor's proposal.

Kathleen Hunker

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From: Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>

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Subject: RE: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Thanks very much Taylor. We will discuss your proposal and an appropriate reply deadline with the Private Plaintiffs and then get back to you.

Dan

From: Taylor Meehan <taylor@consovoymccarthy.com>

Sent: Wednesday, May 24, 2023 1:45 PM

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Thanks, Dan.

I believe this should work for us, and Texas OAG counsel can confirm as well.

We'd propose a July 28 response (mirroring the time between *Hughes* and June 23). We'd be happy to find a time to discuss further by phone if you think necessary.

Thanks,
Taylor

Taylor Meehan
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This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

From: "Freeman, Daniel (CRT)" <Daniel.Freeman@usdoj.gov>

Date: Tuesday, May 23, 2023 at 8:49 AM

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Subject: LULAC v. Abbott, No. 3:21-cv-259 (Redistricting): Proposed Motion for Supplemental Briefing

Counsel:

Attached please find a proposed joint motion regarding supplemental briefing on pending discovery motions in light of the Fifth Circuit's decision in *LULAC Texas v. Hughes*, along with a proposed order. Please let us know when you are available to confer in the next few days, including regarding dates to be inserted in these papers.

Thank you,

Dan

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